

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

FILED

12:15 pm Nov 02 2018

**Clerk U.S. District Court
Northern District of Ohio
Cleveland**

CHRISTOPHER META

Plaintiff,

v.

TARGET CORP., et al.,

Defendants.

)
) CASE NO. 4:14-cv-0832
)
) JUDGE DONALD V. NUGENT
)
)
)
)
)
)

**OBJECTOR ERICH NEUMANN'S
OPPOSITION TO MOTION TO MODIFY APPEAL BOND**

Class Member and Objector Erich Neumann ("Objector") hereby submits this memorandum in opposition to Plaintiff's Motion to Modify Bond to Secure Payment of Costs and Attorneys' Fees on Appeal, ECF No. 197 ("Pl. Mot."). Such a bond is not only unwarranted in this case (and would preclude Neumann's ability to appeal), but is comprised of costs and fees that are not available to Plaintiff under FED. R. APP. P. 7. On these points, Objector respectfully refers the Court to his previous arguments and evidence opposing Plaintiff's previous bond motion. *See* Neumann Bond Opposition Brief, ECF No. 189; Neumann Affidavit, ECF No. 189-1; and Neumann Motion to Reconsider, ECF No. 190. Plaintiff's Motion should be denied in its entirety.

Alternatively, the undersigned seeks an Order pursuant to FED. R. APP. P. 8 staying imposition of any modified bond order (or amount) as against Neumann.¹

¹ As Plaintiff notes, the undersigned is already subject to a motion to dismiss in the Sixth Circuit for purported failure to pay a bond. Pl. Mot. at 2. This motion has been fully briefed.

DATE: October 31, 2018

Respectfully,

A handwritten signature in black ink, consisting of a stylized 'E' followed by a long horizontal line.

Erich Neumann
Attorney and Objector / Class Member
Erich B. Neumann, P.L.
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CERTIFICATE OF SERVICE

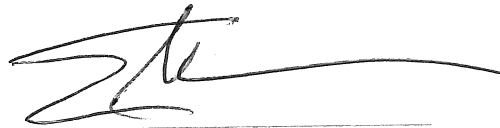
I hereby certify that the foregoing document was mailed to the following on October 31,

2018:

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A handwritten signature in black ink, appearing to be 'E. Neumann', written over a horizontal line.

Erich Neumann